

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and )	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated, )	
Plaintiff, )	Honorable Aleta A. Trauger
vs. )	PLAINTIFF’S UNOPPOSED MOTION FOR
CORRECTIONS CORPORATION OF )	LEAVE TO EXCEED PAGE LIMITATION
AMERICA, et al., )	FOR REPLY IN SUPPORT OF MOTION TO
Defendants. )	COMPEL (ECF NO. 277)
_____ )	

Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Plaintiff”), respectfully requests that the Court grant relief from the five-page limit set forth in Rule 7.01(a)(4) of the Local Rules of Court (“Local Rules”) and allow Plaintiff to file an eight-page Reply in Support of Plaintiff’s Motion to Compel Further Interrogatory Responses and for Discovery Sanctions (ECF No. 277) (“Motion to Compel”). Pursuant to the Court’s July 16, 2020 Order, “[r]esponses and replies shall be filed in accordance with Rule 7.01(a).” ECF No. 244. Local Rule 7.01(a)(4) in turn provides that an “optional reply memorandum may be filed within seven (7) days after service of the response, and shall not exceed five (5) pages without leave of Court.” *Id.*

Plaintiff respectfully submits that three additional pages is a modest but necessary extension to fully brief the complex issues raised in Defendants’<sup>1</sup> opposition (ECF No. 285) to Plaintiff’s Motion Compel. Counsel for Plaintiff have conferred with counsel for Defendants regarding this extension, and Defendants’ counsel does not oppose this request. A proposed order is attached hereto.

DATED: August 26, 2020

Respectfully submitted,

ROBBINS GELLER RUDMAN & DOWD LLP  
CHRISTOPHER M. WOOD, #032977  
CHRISTOPHER H. LYONS, #034853

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s/ Christopher M. Wood  
CHRISTOPHER M. WOOD

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<sup>1</sup> “Defendants” are Corrections Corporation of America and “Individual Defendants” Damon T. Hininger, David M. Garfinkle, Todd Mullenger and Harley G. Lappin. Following the filing of this action, Defendants rebranded CCA and now refer to it as CoreCivic.

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 26, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood

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